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Counsel for Defendant

Counsel for Plaintiffs and the Proposed Classes

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

JILL LEOVY, NICHOLAS GUILAK,
 CAROLINA BARCOS, PAUL MARTIN,
 MARILYN COUSART, ALESSANDRO DE LA
 TORRE, VLADISLAV VASSILEV, JANE
 DASCALOS, and minor G.R., individually, and
 on behalf of all other similarly situated,

 Plaintiffs,

 v.

 GOOGLE LLC,

 Defendant.

CASE NO.: 3:23-cv-03440-AMO

**STIPULATION AND [PROPOSED]
 ORDER TO CONTINUE CASE
 MANAGEMENT CONFERENCE
 AND HEARING ON DEFENDANT
 GOOGLE LLC'S MOTION TO
 DISMISS**

Judge: Hon. Araceli Martínez-Olguín

1 Defendant Google LLC and Plaintiffs Jill Leovy, Nicholas Guilak, Carolina Barcos, Paul
2 Martin, Marilyn Cousart, Alessandro De La Torre, Vladisslav Vassilev, Jane Dascalos, and minor
3 G.R. (collectively, “the Parties”), by and through their respective counsel of record, hereby
4 stipulate as follows:

5 WHEREAS, Plaintiffs filed their First Amended Complaint on January 5, 2024 (ECF No.
6 28);

7 WHEREAS, Defendant moved to dismiss the First Amended Complaint on February 9, 2024
8 (ECF No. 33), Plaintiffs filed their opposition on March 15, 2024 (ECF No. 36), and Defendant filed
9 its reply brief on April 5, 2024 (ECF No. 37);

10 WHEREAS, consistent with the Parties’ prior stipulation (ECF No. 31), the hearing on
11 Defendant’s motion to dismiss was noticed for May 16, 2024 at 2 p.m. (ECF No. 33);

12 WHEREAS, the Parties stipulated in January that it would be more efficient and orderly for
13 the Case Management Conference to take place after the hearing on the motion to dismiss (ECF No.
14 31), and the Court accordingly ordered that the Case Management Conference would be continued
15 to June 6, 2024 at 10 a.m. (or such other time as the Court may order at the hearing on the motion
16 to dismiss) (ECF No. 32);

17 WHEREAS, on April 30, 2024, the Court continued the hearing on Defendant’s motion to
18 dismiss from May 16, 2024 to August 22, 2024 at 2 p.m. (ECF No. 38);

19 WHEREAS, the Parties have agreed, subject to this Court’s approval, that the hearing on
20 Defendant’s motion to dismiss should be continued by two weeks, from August 22, 2024 to
21 September 5, 2024, to accommodate Defendant’s counsel’s unavailability;

22 WHEREAS, the Parties continue to agree that it would be most efficient and orderly for
23 the Initial Case Management Conference to take place at or after the hearing on Defendant’s
24 motion to dismiss;

25 WHEREAS, not all counsel are available on September 12, 2024, and the Court’s
26 Scheduling Notes indicate that the Court is unavailable on September 19 and 26; and
27
28

1 WHEREAS, the Parties defer to the preference of the Court on whether to hold the Case
2 Management Conference on the same day as the hearing on Defendant's motion to dismiss or on
3 the next available date (October 3, 2024);

4 NOW, THEREFORE, pursuant to Civil Local Rules 6-2 and 7-12, the Parties agree, subject
5 to the approval of the Court, as follows:

- 6 1. the hearing on Defendant's motion to dismiss, currently scheduled for August 22, 2024
7 at 2 p.m., shall be continued to September 5, 2024 at 2 p.m.;
- 8 2. the Initial Case Management Conference, currently scheduled for June 6, 2024 at 10
9 a.m., shall be continued to [September 5, 2024] [October 3, 2024] at _____, or
10 such other time as the Court may order at the hearing on the motion to dismiss;
- 11 3. the Parties' joint case management statement shall be filed no later than one week prior
12 to the Case Management Conference; and
- 13 4. the Parties shall make their Rule 26(a) initial disclosures no later than one week prior
14 to the Case Management Conference.

Respectfully submitted,

Dated: May 14, 2024

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ David H. Kramer

David H. Kramer
dkramer@wsgr.com

Counsel for Defendant

Dated: May 14, 2024

CLARKSON LAW FIRM
Professional Corporation

By: /s/ Yana Hart

Yana Hart
yhart@clarksonlawfirm.com

Counsel for Plaintiffs and the Proposed Classes

SIGNATURE ATTESTATION

I, David H. Kramer, am the ECF User whose ID and password are being used to file this document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence in the filing of this document has been obtained from the other signatory.

By: /s/ David H. Kramer

David H. Kramer

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2024

HON. ARACELI MARTÍNEZ-OLGUÍN
UNITED STATES DISTRICT COURT JUDGE